

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAD ERIC MADDALENA,
aka "Chaderic Maddalena,"
aka "Chade Maddalena,"
aka "Chadeeric Maddalena,"

Defendant.

CR **2:25-CR-00150-WLH**

I N D I C T M E N T

[21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), (b)(1)(B)(vi):
Possession with Intent to
Distribute Methamphetamine and
Fentanyl; 21 U.S.C. § 853:
Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about August 28, 2024, in Los Angeles County, within the Central District of California, defendant CHAD ERIC MADDALENA, also known as ("aka") "Chaderic Maddalena," aka "Chade Maddalena," aka "Chadeeric Maddalena," knowingly and intentionally possessed with intent to distribute at least 50 grams, that is, approximately 85.2 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi)]

On or about August 28, 2024, in Los Angeles County, within the Central District of California, defendant CHAD ERIC MADDALENA, also known as ("aka") "Chaderic Maddalena," aka "Chade Maddalena," aka "Chadeeric Maddalena," knowingly and intentionally possessed with intent to distribute at least 40 grams, that is, approximately 189.9 grams, of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

FORFEITURE ALLEGATION

[21 U.S.C. § 853]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853, in the event of the defendant's conviction of the offense set forth in Counts One and Two of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), the defendant, if so convicted, shall forfeit substitute property if, by any act or omission of defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in


1 value; or (e) has been commingled with other property that cannot be
2 divided without difficulty.

3
4 A TRUE BILL

5
6 /s/_____
7 Foreperson

8 JOSEPH T. MCNALLY
9 Acting United States Attorney

10 LINDSEY GREER DOTSON
11 Assistant United States Attorney
12 Chief, Criminal Division

13 
14 FRANCES S. LEWIS
15 Assistant United States Attorney
16 Chief, General Crimes Section

17 SHAWN T. ANDREWS
18 Assistant United States Attorney
19 Deputy Chief, General Crimes
20 Section

21 ALEXANDRA SLOAN KELLY
22 Assistant United States Attorney
23 General Crimes Section
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